

Application No. 09/633,365

Atty Docket: JGR 1142

## REMARKS

Claims 48-69 are pending in this application. These claims presently stand rejected in view of the new grounds of rejection.

Applicants note with appreciation that the Examiner has not maintained his rejections based on Mehr et al. and Sidhu et al. That leaves only the Tenenbaum-related rejections to traverse.

**Claim Rejections under 35 USC 102**

Claims 48-69 are rejected under 35 USC § 102(b) as being disclosed by Tenenbaum et al. (Eco System: An Internet Commerce Architecture). Claims 48-69 are also rejected as being disclosed by Ram Sriram (referenced in Eco System at page 54).

**Tennenbaum et al. Reference**

Recall that Tenenbaum et al. is referenced in [0006] of this application's substitute specification. It has always been clear to Applicants that this invention is **not** what Tennenbaum et al. (or Sriram) described.

From the Tenenbaum et al. reference, the Examiner cites two passages and identifies three figures. The passages do not explain the figures – they are unrelated. The first passage is at the end of the introductory paragraph:

**T**he Internet is revolutionizing commerce. It provides the first affordable and secure way to link people and computers spontaneously across organizational boundaries. This is spawning numerous innovative enterprises—virtual companies, markets, and trading communities.

The only reference in the article to “trading communities” is as reproduced above. Next, from page 52 (actually appearing in col. 2):

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- *Scaleable, interchangeable building blocks.* Agents can direct CBL commands to a business, several businesses that have linked their catalogs or processes, a market (comprised of many companies), or a third-party intermediary.

There are several references to catalogs, which help us understand the page 52 passage. From page 50,

Each framework specifies core services that all application objects belonging to that class (for example, **payments and catalogs**) must provide. They must also specify a network services interface (NSI). An NSI is a set of messages in an implementation-independent language (CORBA IDL, Interface Definition Language). ... [¶] Every application under Eco System—whether a **catalog** or an entire I-market—is a network-accessible service. ... These core services literally define what it means to be, for example, a **payment, shipping, or catalog service**. Vendors will differentiate their products by providing additional services beyond those specified in the framework.

In these words, payments and catalogs are core services provided by the framework; catalogs not programming tools or interface definitions. In Tennenbaum's Table 1, the services for a "catalog" allow a user to perform a search and add, delete or modify a listing. It is unmistakable that Tennenbaum et al.'s catalogs are for buyers to browse when making a purchase, not to define e-commerce business services and documents to be exchanged with such services by trading partners.

The Examiner references, without explanation, figures 2, 3, 4 and 5 from the article. Figure 2 explains in its caption that "frameworks communicate among themselves via NSIs and with application modules via APIs." Neither this caption nor the illustration address the claimed limitations.

Figure 3 explains, "Eco services will be available as objects accessible via CBL commands sent over IIOP or HTTP/HTML sent by a browser. The architecture also incorporates Java applets, which link Web services to more robust transaction-oriented services via IIOP." This approach is an alternative to what is claimed. It is inconsistent with the claimed registry of definitions of documents exchanged with services by trading partners. CBL commands sent over the CORBA IIOP bus, illustrated in figure 5, are not documents. They are encapsulated parameter sets that are processed by programs that are aware of their syntax and semantics. These CORBA objects are handled by hard coded routines that do not make use of machine-readable

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specification of business services and documents to be exchanged. Inadequacies of CORBA IIOP and the commercial frameworks invoked by Tenenbaum et al. are addressed in the application at [0007]-[0010]. The caption to figure 3 supports the explanation of inadequacies to CORBA IIOP and object request broker (ORB) technologies and of HTML applets, neither of which address the claimed limitations.

Figure 4 is a protocol stack for using CORBA IIOP with the commercial frameworks invoked by Tenenbaum et al., which, again, are addressed in the application at [0007]-[0010].

Figure 5 illustrates the ORB and CORBA IIOP bus as a messaging system among services. Figure 5 does not illustrate a registry of machine-readable specifications. Applicants do not find machine-readable specifications specifying business services offered. We do not find a protocol that exchanges documents with services. We do not find machine-readable specifications of documents to be exchanged with services. We do not find providing machine-readable specifications from a registry to a requesting node.

With this discussion in mind, we address the particular claims.

Regarding **claim 48**, Applicants do not find in the cited passages,

*maintaining a registry of machine-readable specifications specifying business services offered by trading partners, the machine-readable specifications including at least one of definitions of, and references to definitions of, services offered and at least one of definitions of, and references to definitions of, documents to be exchanged with such services by trading partners; and*

*providing, in response to a request, one or more of the machine-readable specifications from said registry via a communication network to a requesting node.*

We do not find anywhere in Tenenbaum et al. a registry of machine-readable specifications. We do not find machine-readable specifications specifying business services offered. We do not find a protocol that exchanges documents with services. We do not find machine-readable specifications of documents to be exchanged with services. We do not find providing machine-readable specifications from a registry to a requesting node.

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Regarding claims 49-50 and 53, Applicants do not find in figures 2-4 "*data identifying respective descriptions of sets of storage units and logical structures for the sets of storage units*" or "*data adapted for parsing to identify an input document and one or more transactions which accept said input document*". Again, CORBA IIOP was not document-based, as those of skill in the art would understand the alternative paradigms.

Regarding claim 51, Applicants do not find in figures 2-3 "*definitions of the documents to be exchanged compris[ing] respective descriptions of sets of storage units and logical structures for the sets of storage units*".

Regarding claim 52, Applicants do not find in figures 2-4 "*machine-readable specifications includ[ing] documents compliant with a definition of a predefined document including logical structures for storing an identifier of a particular transaction, and at least one of definitions and references to definitions of input and output documents for the particular transaction*". This is not how CORBA IIOP worked.

Regarding claims 54-56 and 59-69, the Examiner relies on a further passage from page 52:

### **Object orientation**

Every Eco System service is a network-accessible object. As shown in Figure 3, objects respond to agents using CBL commands delivered over IIOP and to browsers using HTTP, HTML, and Java. This duality maintains compatibility with current Web sites and affords a graceful migration path. It's also compatible with emerging industry trends and anticipates the possibility that the next generation of HTTP and IIOP may someday merge. If the industry does not widely accept CORBA, agents will still be able to access the Web by using embedded semantic markup. Such embedded markup will let agents understand and respond to the information depicted graphically in a Web page. Microsoft and Netscape recently endorsed XML (Extended Markup Language), a simplified version of SGML used for embedding tags into HTML.

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This passage foretells that "the next generation of HTTP and IOP may someday merge." Without using the present application as a blueprint for reading this properly, no one would be lead from Tenenbaum et al.'s words to the claimed invention. The passage also refers to every Eco System as a "network accessible object." One familiar with COBRA will understand this to mean that Eco System services are hard-coded objects that interact with parameter lists having syntax and semantics defined by the programmer during coding. The hard-coded objects do not interact with a machine-readable specification in a registry.

Applicants do not find in Tenenbaum et al.,

*maintaining a registry of machine-readable specifications specifying business services offered by trading partners, the machine-readable specifications including at least one of definitions of, and references to definitions of, services offered and at least one of definitions of, and references to definitions of, documents to be exchanged with such services by trading partners, wherein said machine-readable specifications comprise data identifying respective descriptions of sets of storage units and logical structures for the sets of storage units; and*

*providing, in response to a request, one or more of the machine-readable specifications from said registry via a communication network to a requesting node,*

*wherein the storage units comprise parsed data, and wherein the parsed data in at least one of the documents to be exchanged comprises:*

*character data encoding text characters in the one of the input and output documents, and*

*markup data identifying sets of storage units according to the logical structure of the one of the input and output documents.*

Nor do we find the additional limitations of the claims that depend from claim 54.

Regarding **claim 57**, Applicants do not find in figures 2-4 "storage units compris[ing] unparsed data". CORBA IOP messages are syntactically and semantically parsed before transmission.

Regarding **claim 58**, Applicants do not find in the originally cited passages (pp. 48, 52) the claimed association of trading partners with machine-readable specifications. Among other reasons, the Tenenbaum et al. does not describe machine-readable specifications.

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Having reviewed Tenenbaum et al. and its application to each of the claims, Applicants respectfully submit that **claims 48-69** should be allowable over this reference.

**Sriram Reference**

The Examiner also rejected **claims 48-69** as being disclosed by Ram Sriram, a sidebar on page 54, between parts of Tenenbaum et al. Again, recall that the Tenenbaum et al. publication is referenced in [0006] of this application's substitute specification, to make it clear this invention is not what Sriram described.

Sriram is so brief and obtuse that little can be said about the system it describes, except that AIMSNet is no longer to be found in use, not on Lockheed Martin's web site, even using a Google search. It failed. The claimed technology has, in contrast, been a great commercial success and has been widely adopted.

The passages that the Examiner cites are:

AIMSNet, a product of the Agile Infrastructure for Manufacturing Systems (AIMS) program, is a working example of an I-market in the making. Using AIMSNet, an intercompany network (using the Internet) links companies like Lockheed Martin and its suppliers, allowing multi-company project teams to exchange technical and business information, collaborate on design, post quotes and purchase orders, tender or accept bids, find potential suppliers and partners and track project milestones. More than 10 companies currently use AIMSNet, and dozens more are joining soon.

AIMSNet, an industrial commerce infrastructure, is currently piloted as an aerospace I-market but can be easily customized to several other I-markets including automotive, electronics, and construction.

These passages do not provide any detail regarding the infrastructure (now failed) of AIMSNet. Applicants do not find anywhere in Sriram a registry of machine-readable specifications. We do not find machine-readable specifications specifying business services offered. We do not find a protocol that exchanges documents with services. We do not find machine-readable specifications of documents to be exchanged with

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services. We do not find providing machine-readable specifications from a registry to a requesting node. Therefore, **claim 48** and **claims 49-58** that depend from it should be allowable over Sriram.

Applicants do not find in Sriram,

*maintaining a registry of machine-readable specifications specifying business services offered by trading partners, the machine-readable specifications including at least one of definitions of, and references to definitions of, services offered and at least one of definitions of, and references to definitions of, documents to be exchanged with such services by trading partners, wherein said machine-readable specifications comprise data identifying respective descriptions of sets of storage units and logical structures for the sets of storage units; and*

*providing, in response to a request, one or more of the machine-readable specifications from said registry via a communication network to a requesting node,*

*wherein the storage units comprise parsed data, and wherein the parsed data in at least one of the documents to be exchanged comprises:*

*character data encoding text characters in the one of the input and output documents, and*

*markup data identifying sets of storage units according to the logical structure of the one of the input and output documents.*

Nor do we find the additional limitations of the claims that depend from claim 54.

Therefore, **claim 54** and **claims 55-69** that depend from it should be allowable over Sriram.

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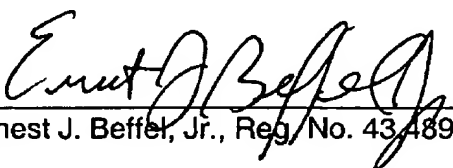
CONCLUSION

Applicants respectfully submit that the pending claims are now in condition for allowance and thereby solicit acceptance of the claims, in light of these remarks.

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Respectfully submitted,

Dated: 8 March 2005

  
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